REMARKS/ARGUMENTS

1.) Claim Amendments

Claims 1-18 are pending in the application. The Applicants have amended claims 1, 2, 6, 9, 10, and 13-15. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Allowable Subject Matter

On Page 8 of the Office Action, the Examiner stated that claims 2-4 and 10-12 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. The Applicants have rewritten claims 2-4 and 10-12 in this manner. Therefore, the allowance of claims 2-4 and 10-12 is respectfully requested.

3.) Claim Rejections – 35 U.S.C. § 103(a)

On Page 2 of the Office Action, the Examiner rejected claims 1, 5-9, 13-18 under 35 U.S.C. § 103(a) as being unpatentable over Brownell et al, (PGPUB 2003/0130833) in view of Chin, et al. (US 5,617,421). The Applicants have amended the claims to better distinguish the claimed invention from Brownell and Chin. The Examiner's consideration of the amended claims is respectfully requested.

Regarding claims 1, 14, and 18, the Examiner contends that Brownell discloses the first two portions of the Applicants' claimed invention, but does not explicitly teach the third or fourth portions. The Applicants respectfully disagree that Brownell discloses the first portion of the Applicants' claimed invention. Specifically, Brownell does not disclose or suggest utilizing a first portion of the virtual MAC address to define a MAC domain for the address. For this limitation, the Examiner cites paragraph [0041], lines 9-10 of Brownell where a field containing a node ID is disclosed. However, the node ID is not the same thing as a MAC domain.

The Applicants have amended claims 1 and 14 to clarify that the step of utilizing a first portion of the virtual MAC address to define a MAC domain for the address

includes defining different MAC domains for units that have the same unit-unique MAC address, thereby ensuring each unit has a unique locally administered virtual MAC address. Basis for the amendment is found in the originally filed specification in paragraphs [0023] and [0024]. A node ID, as disclosed by Brownell, is not sufficient to ensure unique addresses.

The Examiner cites Chin, col. 13, lines 20-31 and col. 15, lines 36-49 for showing the third and fourth portions of the Applicants' claimed invention. However, rather than disclosing a method of mapping an original MAC address to a unique locally administered virtual MAC address, Chin discloses a switching fabric and a method of routing packets addressed to nodes in different virtual networks (i.e., VN1 and VN2). Chin's so-called "domain" is actually a network identifier such as VN1 or VN2. This is quite different from the Applicants' MAC domain, which identifies different domains within a network. Chin also states, "Each entry is defined by the endstation address, which is, in fact, an IEEE standard 48-bit memory access controller (MAC) address." Thus, the network identifier "domain" in Chin is used in addition to a standard MAC address rather than being a portion of the MAC address as claimed by the Applicants.

Thus, the combination of Brownell and Chin fails to teach or suggest a unique locally administered virtual MAC address having portions as claimed by the Applicants. Therefore, the allowance of amended claims 1 and 14 is respectfully requested.

Claims 5-8 depend from amended claim 1 and recite further limitations in combination with the novel elements of claim 1. Therefore, the allowance of claims 5-8 is respectfully requested.

Claim 18 recites a method of mapping an original MAC address to a unique locally administered virtual MAC address. The method includes the steps of utilizing a first portion of the virtual MAC address to define a MAC domain for the address; utilizing a second portion of the virtual MAC address to indicate that the address is a locally administered address; and utilizing a third portion of the virtual MAC address to uniquely identify specific users within each MAC domain. Brownell and Chin fail to teach or suggest such a mapping method within a MAC address. Chin adds network identifiers external to the MAC address for use in a switching fabric. Brown fails to teach or suggest defining a MAC domain for each address within a network. Together, the two

references fail to teach or suggest uniquely identifying specific users within each MAC domain. Therefore, the allowance of claim 18 is respectfully requested.

Independent claim 9 has been amended in a manner similar to claim 1 to recite that the means for utilizing a first portion of the virtual MAC address to define a MAC domain for the address includes means for defining different MAC domains for units that have the same unit-unique MAC address, thereby ensuring each unit has a unique locally administered virtual MAC address. As discussed above, these features are not taught or suggested by Brownell and Chin. Therefore, the allowance of amended claim 9 is respectfully requested.

Claim 13 depends from amended claim 9 and recites further limitations in combination with the novel elements of claim 9. Therefore, the allowance of claim 13 is respectfully requested.

Independent claim 15 has been amended in a manner similar to claim 1 to recite that the logic adapted to utilize the first portion of the virtual MAC address to define a MAC domain for the address includes logic adapted to define different MAC domains for units that have the same unit-unique MAC address, thereby ensuring each unit has a unique locally administered virtual MAC address. As discussed above, these features are not taught or suggested by Brownell and Chin. Therefore, the allowance of amended claim 15 is respectfully requested.

Claims 16 and 17 depend from amended claim 15 and recite further limitations in combination with the novel elements of claim 15. Therefore, the allowance of claims 16 and 17 is respectfully requested.

On Page 7 of the Office Action, the Examiner rejected claims 6-7 under 35 U.S.C. § 103(a) as being unpatentable over Brownell in view of Chin and further in view of Fujisawa (US 2003/0039260). The Examiner cites paragraph [0089] of Fujisawa for showing the limitation of claim 6. The Applicants respectfully disagree.

First, claim 6 depends from amended claim 1 and recites further limitations in combination with the novel elements of claim 1. Therefore, the allowance of claim 6 is respectfully requested.

Second, there is no disclosure in Fujisawa of defining a MAC domain and ensuring that unique addresses are assigned within each domain. Fujisawa only

teaches that if a MAC address is not found in the Ethernet-IEEE 1394 conversion table 61, the CPU 11 prepares a proxy offset that is not a duplicate of any of the proxy offsets a1, a2 . . . already in the table, and stores it. Therefore, the allowance of claim 6 is respectfully requested.

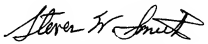
Claim 7 depends from claim 6 and amended base claim 1 and recites further limitations in combination with the novel elements of claims 1 and 6. Therefore, the allowance of claim 7 is respectfully requested.

4.) Conclusion

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-18.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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